

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PERRONG,	:	CIVIL ACTION
<i>Plaintiff,</i>	:	
	:	
v.	:	No. 22-1085
	:	
TIMESHARE HELP SOURCE, LLC,	:	
<i>Defendant.</i>	:	

NOTICE

AND NOW, this 2nd day of August, 2022, upon consideration of defense counsel’s attached email letter to the Court, the Court hereby takes notice of the contents of the email and counsel’s objection to the Court surmising that counsel, rather than his “client” has something to do with the behavior the Court finds offensive. It is not a matter of offensive behavior. It is a matter of completely ignoring the direction of this Court to identify the person or persons counsel refers to as “client” so the Court can hold the person or persons responsible for (1) refusing to engage in this litigation and (2) filing meaningless, redundant, and procedurally defective objections rather than cooperating with the Court. To this day the person or persons have not been identified to this Court despite clear direction that those person or persons be identified.

Despite this Court’s best efforts to identify a responsible person on behalf of the defendant to get this case moving as this Court is required to do from a case management perspective, the “client” has still not been identified, and there has

been no motion to withdraw despite the client's lack of payment and lack of cooperation with the Court despite counsel's advice. Certainly, the culpability remains with the client, however, this does not explain the apparent refusal to name who this client is. The initial narrative by counsel to the Court was the "client" (no name provided) was in Uzbekistan being delayed because of Covid restrictions, the next narrative was the "client" just sold the company to a holding company, the next narrative was the Sales Manager was providing all the information, the next narrative was that the Sales Manager is no longer with the company, the next narrative was the company's in house counsel was being provided the information and relaying it to counsel, that counsel turned out to be outside counsel who is no longer involved, the next narrative was that Dan Human provided the information, the latest narrative is that Dan Human is no longer employed, and yet, to this day in the attached email, we have come full circle and the Court is being told that a "client" is advising counsel. The latest narrative is the "client" is informing counsel that Defendant is engaging bankruptcy counsel and is on the cusp of bankruptcy.

With this pattern in mind, the Court is expecting a new narrative once this litigation now starts to take on a linear direction. That still begs the question, who is this "client" that the Court has been trying to identify through counsel and counsel, without a new explanation or narrative other than "bankruptcy on the

horizon”, still will not identify, and yet counsel objects to the Court taking issue with this refusal.

BY THE COURT:

/s/ Chad F. Kenney
CHAD F. KENNEY, J.

From: [Arthur Goldman](#)
To: [Robert Gustafson](#); anthony@paronichlaw.com
Cc: [Chambers of Judge Chad F Kenney](#)
Subject: RE: Activity in Case 2:22-cv-01085-CFK PERRONG v. TIMESHARE HELP SOURCE, LLC Letter
Date: Tuesday, August 2, 2022 9:58:09 AM

CAUTION - EXTERNAL:

I am in receipt of the Court's Order of today granting the motion to compel and cancelling the conference.

I have to strongly object to any inference that I am somehow culpable in the behavior the Judge finds offensive.

My client has advised me the bankruptcy will be any day. I have been told that the entity is no longer operational. I have not been provided with any alternate names.

I have not received payment on my bills.

I have tried as best as possible and frequently to persuade my client to cooperate with the court, but all I received was the objections which I filed yesterday which I did as a final act, without payment.

As soon as I receive the bankruptcy information I will forward it for the court, but as of now, without communication or payment, I am at a standstill.

Thank you for your consideration.

Arthur D. Goldman
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